

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

Richard Tamez, Billy Tom Medlin,	:	CIVIL ACTION 5:15-cv-330-RP
Gavin Reynolds, and James Clark,	:	
on behalf of themselves and other	:	
similarly situated individuals,	:	ELECTRONICALLY FILED
	:	
Plaintiffs,	:	
v.	:	PLAINTIFFS' MOTION FOR
	:	CONDITIONAL CERTIFICATION
	:	AND COURT-AUTHORIZED NOTICE
BHP Billiton Petroleum (Americas), Inc.	:	
	:	
Defendant.	:	

Plaintiffs Richard Tamez, Billy Tom Medlin, Gavin Reynolds, and James Clark (collectively, “Plaintiffs”), through their undersigned counsel, respectfully moves this Court for an Order conditionally certifying the following FLSA collective class:

All persons who worked for Defendant and were paid a “day rate” at any time since three years prior to April 24, 2015, the filing date for the Complaint.

pursuant to 29 U.S.C. § 216(b). This Motion is made based on the accompanying Memorandum of Law, declaration of Alexander M. Baggio and the exhibits attached thereto.

DATED: August 19, 2015

/s/Alexander M. Baggio
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Attorneys For Plaintiffs and the Putative
FLSA Collective Class

CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2015, the foregoing document was filed with the Court through the Court's CM/ECF System, and electronic notice of such filing has been sent to all counsel of record:

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/s/Alexander M. Baggio
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